

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BONNIE WEBB, on behalf of plaintiff and a class,)
Plaintiff,) Case No. 11-cv-5111
v.) Judge Joan H. Lefkow
MIDLAND CREDIT MANAGEMENT, INC.,) Magistrate Judge Martin C. Ashman
MIDLAND FUNDING, LLC and ENCORE)
CAPITAL GROUP, INC.,)
Defendants.)

**DEFENDANTS' MOTION FOR ENLARGEMENT OF TIME TO ANSWER, MOVE
OR OTHERWISE PLEAD TO PLAINTIFF'S COMPLAINT**

Defendants MIDLAND CREDIT MANAGEMENT, INC., MIDLAND FUNDING, LLC and ENCORE CAPITAL GROUP, INC. (collectively “defendants”), by their attorneys David M. Schultz and Clifford E. Yuknis of Hinshaw & Culbertson LLP, respectfully move this Honorable Court for an additional 14-day enlargement of time to answer, move or otherwise plead to Plaintiff’s Class Action Complaint (“Complaint”) to and including October 3, 2011. In further support of this motion, defendants state as follows:

1. Plaintiff’s Complaint purports to state claims against defendants for violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.* (FDCPA).
2. Defendants’ answer or other responsive pleading is due on September 19, 2011.
3. Defendants have evidence that indicates this matter is subject to arbitration.
4. Defendants need the additional time to gather the necessary information from a third party in order to file a motion to compel arbitration and to stay these proceedings pending the completion of the arbitration.

5. This time is not meant for purposes of unnecessary delay and will not prejudice any party in the litigation.

WHEREFORE, Defendants MIDLAND CREDIT MANAGEMENT, INC., MIDLAND FUNDING, LLC and ENCORE CAPITAL GROUP, INC. respectfully request that this Court grant it a 14-day enlargement of time up to and including October 3, 2011, to answer, move or otherwise plead to Plaintiff's Class Action Complaint.

HINSHAW & CULBERTSON LLP

By: /s/ Clifford E. Yuknis

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